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WASHINGTON, DC 20460
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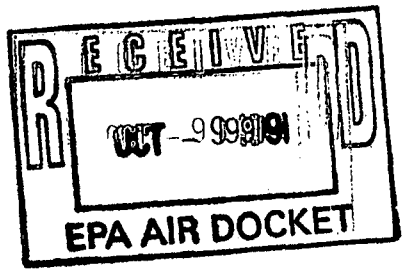

Re: MMT Waiver Request

Dear Sirs,

We refer with the present letter to the Ethyl MMT waiver resubmission of last July.

SEDEMA, Division of SADACEM S.A. is producing in Belgium Manganese salts and oxides since 1964.

The Rouls and Al Mn toxicological study has been performed at our plant during 1981/83.

Our Mr. M. Fautsch attended the last EPA conference Mn-MMT toxicity in Raleigh, N.C. in last May 1991.

We have been informed by our sister company Chemetals Corp. that there were some uncertainties about the Mn exposure levels to be defined. We therefore consider useful to inform you about what we produce and to give you our opinion about Mn air concentrations in our plant in relation with the Rouls and Al study.(*)

SEDEMA started its production in 1964 at relatively low scale and reached the original plant capacity around 1970.

(*) : Am. Journal of Industrial Medicine 11:297-305 (1987)
Am. Journal of Industrial Medicine 11:307-327 (1987)

sedema
Sadacem

OCT. 1991

sedema

DIVISION DE SADACEM S.A.
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sedema

Sadacem

From 1970 on, as shown in Appendix I, SEDEMA had several important increases of capacity in the ore storage, preparation, milling and roasting sections together with new facilities producing new types of salts and oxides.

After these investments, SEDEMA has been and remains the world market leader of the Mn3O4 products (primary Mn derivative for the soft ferrite industry) with a production capacity of approximately 6,000 tons per year Mn3O4 and the European market leader for all the other products.
Total SEDEMA's sales are at the level of 55,000 tons/year Mn compounds including approximately 5,000 tons/year Mn3O4 fines powders. To achieve this sales volume of end-products, the total tonnages handled reach 250,000 tons/year because of the many intermediate products used internally.

Those new facilities have been built using best available technologies at the time and have required extension of the plant area as well as increase of the work force (+ 30 % between 1982 and 1976).

Obviously, these changes would not allow an increase in Mn air concentrations and occupational exposures.

Moreover, the Rouls and Al study defines work places corresponding to specific zones built at different times. At the exception of the work places not directly related to the manganese production (i.e. offices, laboratories and general services), the last production units built between 1980 and 1982 show in the Rouls data the lowest level of manganese concentration.

Consequently, we consider incorrect the assumption that occupational exposures were lower at SEDEMA before the time of the Rouls and Al study.

This opinion is shared today by Prof. Lauwerijs and Dr. Rouls themselves.

We trust the above information will be useful to you.

Sincerely yours

MARC FAUTSCH

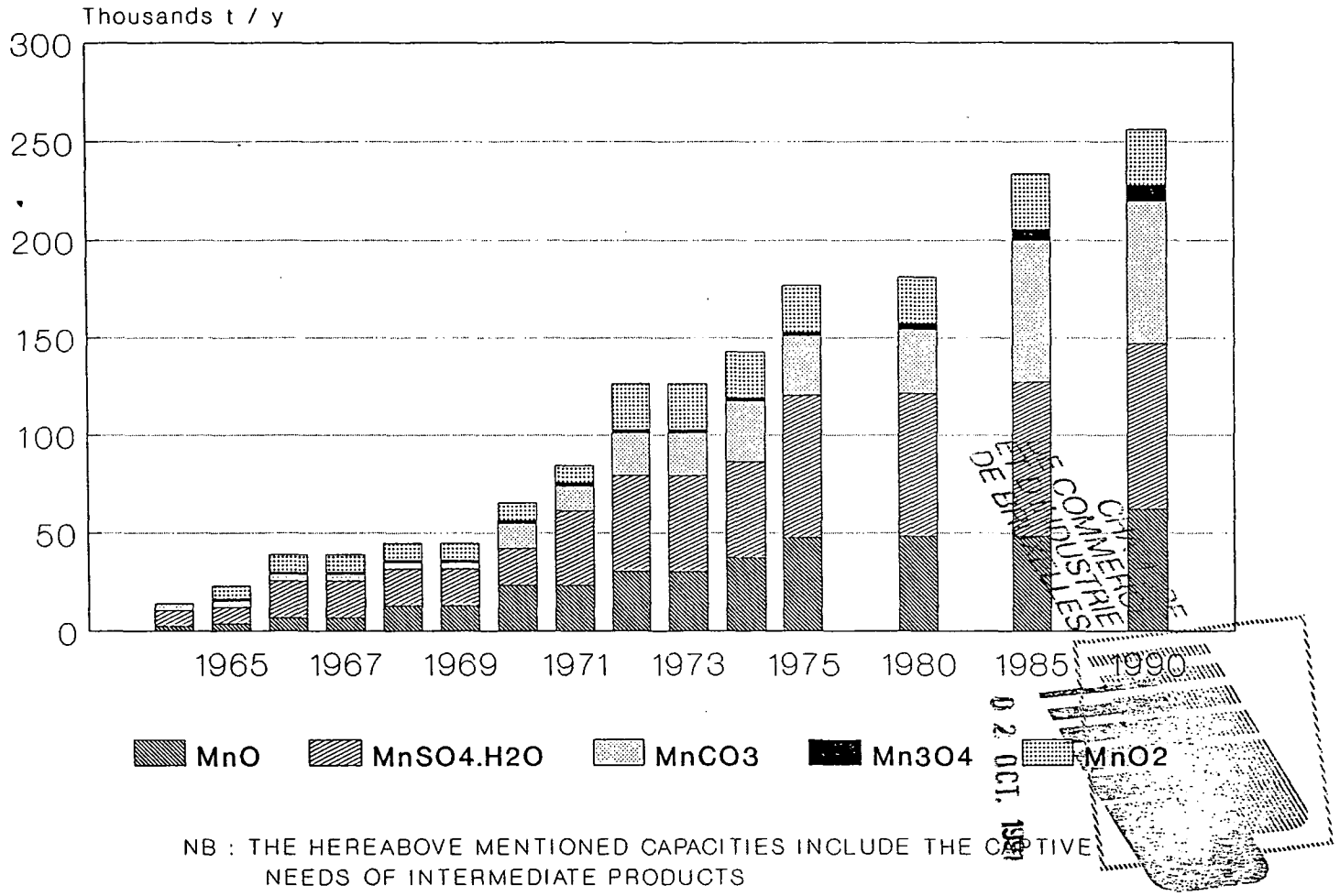
Annex: 1 diagram

pour la Chambre de Commerce et d'Industrie de Bruxelles.

Bruxelles le 3 OCT. 1991

Marguerite HERMANS

SEDEMA : HISTORICAL EVOLUTION OF THE MANGANESE PRODUCTION CAPACITIES



NB : THE HEREABOVE MENTIONED CAPACITIES INCLUDE THE CAPTIVE NEEDS OF INTERMEDIATE PRODUCTS